

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
Paul D. Leake
Jason N. Kestecher
Four Times Square
New York, New York 10036-6522
Telephone: (212) 735-3000
Fax: (212) 735-2000

– and –

James J. Mazza, Jr. (admitted *pro hac vice*)
Justin M. Winerman (admitted *pro hac vice*)
155 North Wacker Drive
Chicago, Illinois 60606-1720
Telephone: (312) 407-0700
Fax: (312) 407-0411

Counsel to Debtors and Debtors-in-Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

**TRIDENT HOLDING COMPANY, LLC, *et al.*,
Debtors.¹**

Chapter 11

Case No. 19-10384 (SHL)

(Jointly Administered)

**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR HEARING
ON MAY 1, 2019 AT 2:00 P.M. (PREVAILING EASTERN TIME)**

Location of Hearing: Honorable Sean H. Lane, Courtroom 701, United States
Bankruptcy Court, Southern District of New York, One Bowling
Green, New York, NY 10004

¹ The Debtors in these chapter 11 cases, along with the last four digits of their respective tax identification numbers, are as follows: Trident Holding Company, LLC (6396); American Diagnostics Services, Inc. (2771); Community Mobile Diagnostics, LLC (9341); Community Mobile Ultrasound, LLC (3818); Diagnostic Labs Holdings, LLC (8024); FC Pioneer Holding Company, LLC (6683); JLMD Manager, LLC (8470); Kan-Di-Ki LLC (6100); Main Street Clinical Laboratory, Inc. (0907); MDX-MDL Holdings, LLC (2605); MetroStat Clinical Laboratory – Austin, Inc. (4366); MX Holdings, LLC (8869); MX USA, LLC (4885); New Trident Holdcorp, Inc. (4913); Rely Radiology Holdings, LLC (3284); Schryver Medical Sales and Marketing, LLC (9620); Symphony Diagnostic Services No. 1, LLC (8980); Trident Clinical Services Holdings, Inc. (6262); Trident Clinical Services Holdings, LLC (1255); TridentUSA Foot Care Services LLC (3787); TridentUSA Mobile Clinical Services, LLC (0334); TridentUSA Mobile Infusion Services, LLC (5173); U.S. Lab & Radiology, Inc. (4988). The address of the Debtors' corporate headquarters is 930 Ridgebrook Road, 3rd Floor, Sparks, MD 21152.

Copies of Motions and
Applications:

Copies of each pleading identified below can be viewed and/or obtained by: (i) accessing the Court's website at www.nysb.uscourts.gov, (ii) contacting the Office of the Clerk of the Court at United States Bankruptcy Court, Southern District of New York, One Bowling Green, New York, NY 10004, or (iii) from the Debtors' notice and claims agent, Epiq Corporate Restructuring, LLC, at <https://dm.epiq11.com/Trident> or by calling 1-800-960-1226. Note that a PACER password is needed to access documents on the Court's website.

I. UNCONTESTED MATTERS

1. **BDO Retention:** Debtors' Application for Entry of an Order (I) Authorizing and Approving the Retention and Employment of BDO USA, LLP as Tax Advisor Effective *Nunc Pro Tunc* to February 10, 2019, (II) Granting a Modification of the Requirements of Local Rule 2016-1 and the U.S. Trustee Guidelines, and (III) Granting Related Relief [Docket No. 190] (Date Filed: 3/13/19)

Related
Documents:

- a. Certificate of No Objection to Debtors' Application for Entry of an Order (I) Authorizing and Approving the Retention and Employment of BDO USA, LLP as Tax Advisor Effective *Nunc Pro Tunc* to February 10, 2019, (II) Granting a Modification of the Requirements of Local Rule 2016-1 and the U.S. Trustee Guidelines, and (III) Granting Related Relief [Docket No. 338] (Date Filed: 4/25/19)

Objection

Deadline: April 10, 2019 at 4:00 p.m. (Prevailing Eastern Time)

Objections/

Responses Filed: None.

Status: The Debtors respectfully submit that this application may be granted in advance of a hearing. The Debtors have filed a certificate of no objection pursuant to Local Rule 9075-2, stating that no formal or informal objections or responses to the application have been received, or that all such objections or responses have been resolved.

2. **Lease Extension Motion:** Debtors' Motion for Entry of an Order (I) Extending Time Within Which the Debtors May Assume or Reject Unexpired Leases of Nonresidential Real Property and (II) Establishing Procedures to Approve Agreements Further Extending the 365(d)(4) Deadline [Docket No. 250] (Date Filed: 3/25/19)

Related
Documents:

- a. Certificate of No Objection Pursuant to Local Rule 9075-2 Regarding Debtors' Motion for Entry of an Order (I) Extending Time Within Which the Debtors May Assume or Reject Unexpired Leases of Nonresidential Real Property and (II) Establishing Procedures to Approve Agreements Further Extending the 365(d)(4) Deadline [Docket No. 339] (Date Filed: 4/26/19)

Objection
Deadline: April 8, 2019 at 4:00 p.m. (Prevailing Eastern Time)

Objections/
Responses Filed: None.

Status: The Debtors respectfully submit that this motion may be granted in advance of a hearing. The Debtors have filed a certificate of no objection pursuant to Local Rule 9075-2, stating that no formal or informal objections or responses to the motion have been received, or that all such objections or responses have been resolved.

II. CONTESTED MATTERS

3. **Solicitation Motion:** Debtors' Motion for Entry of an Order (A) Approving the Adequacy of the Debtors' Disclosure Statement and Notice of the Disclosure Statement Hearing; (B) Approving Solicitation and Notice Procedures with Respect to Confirmation of the Debtors' Joint Proposed Plan; (C) Approving the Form of Various Ballots and Notices in Connection Therewith; and (D) Scheduling Certain Dates with Respect Thereto [Docket No. 254] (Date Filed: 3/26/19)

Related
Documents:

- a. Joint Plan of Reorganization of Trident Holding Company, LLC and Its Debtor Affiliates [Docket No. 252] (Date Filed: 3/25/19)
- b. Disclosure Statement for the Joint Plan of Reorganization of Trident Holding Company, LLC and Its Debtor Affiliates [Docket No. 253] (Date Filed: 3/25/19)
- c. Notice of Hearing to Consider Approval of the Disclosure Statement for the Joint Plan of Reorganization of Trident Holding Company, LLC and Its Debtor Affiliates [Docket No. 259] (Date Filed: 3/26/19)
- d. Certificate of Publication regarding Notice of Hearing to Consider Approval of the Disclosure Statement for the Joint Plan of Reorganization of Trident Holding Company, LLC and Its Debtor Affiliates [Docket No. 270] (Date Filed: 3/29/19)

- e. Notice of Amended Joint Plan of Reorganization of Trident Holding Company, LLC and Its Debtor Affiliates [Docket No. 346] (Date Filed: 4/29/19)
- f. Notice of Amended Disclosure Statement for the Amended Joint Plan of Reorganization of Trident Holding Company, LLC and Its Debtor Affiliates [Docket No. 347] (Date Filed: 4/29/19)
- g. Notice of Filing of Revised Exhibits to Proposed Order (A) Approving the Adequacy of the Debtors' Disclosure Statement and Notice of the Disclosure Statement Hearing; (B) Approving Solicitation and Notice Procedures with Respect to Confirmation of the Debtors' Joint Proposed Plan; (C) Approving the Form of Various Ballots and Notices in Connection Therewith; and (D) Scheduling Certain Dates with Respect Thereto [Docket No. 349] (Date Filed: 4/29/19)

Objection

Deadline: April 24, 2019 at 4:00 p.m. (Prevailing Eastern Time)

Objections/

Responses Filed:

- h. Limited Objection of Element Fleet Corporation to: (I) Disclosure Statement for the Joint Plan of Reorganization of Trident Holding Company, LLC and Its Debtor Affiliates (D.I. 253); and to (II) Debtors' Motion for Entry of an Order (A) Approving the Adequacy of the Debtors' Disclosure Statement and Notice of the Disclosure Statement Hearing; (B) Approving Solicitation and Notice Procedures with Respect to Confirmation of the Debtors' Joint Proposed Plan; (C) Approving the Form of Various Ballots and Notices in Connection Therewith; and (D) Scheduling Certain Dates with Respect Thereto (D.I. 254) [Docket No. 329] (Date Filed: 4/24/19)
- i. Objection of The Existing First Lien Agent to Debtors' Motion for Entry of an Order (A) Approving the Adequacy of the Debtors' Disclosure Statement and Notice of the Disclosure Statement Hearing; (B) Approving Solicitation and Notice Procedures with Respect to Confirmation of the Debtors' Joint Proposed Plan; (C) Approving the Form of Various Ballots and Notices in Connection Therewith; and (D) Scheduling Certain Dates with Respect Thereto [Docket No. 330] (Date Filed: 4/24/19)
- j. Objection of the Official Committee of Unsecured Creditors to Debtors' Motion for Entry of an Order (A) Approving the Adequacy of the Debtors' Disclosure Statement and Notice of the Disclosure Statement Hearing; (B) Approving Solicitation and Notice Procedures with Respect to Confirmation of the Debtors' Joint Proposed Plan; (C) Approving the Form of Various Ballots and Notices in Connection Therewith; and (D) Scheduling Certain Dates with Respect Thereto [Docket No. 331] (Date Filed: 4/24/19)

- k. Objection of United States Trustee to Disclosure Statement for Joint Chapter 11 Plan of Reorganization of Trident Holding Company, LLC, *et al.*, Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 332] (Date Filed: 4/24/19)
- l. Debtors' Omnibus Reply to the Disclosure Statement Objections [Docket No. 348] (Date Filed: 4/29/19)
- m. Joinder Of SCPC Group, LLC and Certain of Its Affiliates to the Debtors' Omnibus Reply to the Disclosure Statement Objections [Docket No. 350] (Date Filed: 4/29/19)

Status: This matter is going forward.

- 4. **Key Employee Motion:** Debtors' Motion for Entry of an Order (I) Approving the Implementation of the Debtors' Key Employee Incentive Plan and Key Employee Retention Plan and (II) Granting Related Relief [Docket No. 112] (Date Filed: 2/27/19)

Related
Documents:

- a. [REDACTED] Second Supplemental Declaration of Russell A. Perry in Further Support of the Debtors' Key Employee Incentive Plan [Docket No. 283] (Date Filed: 4/4/19)
- b. Objection of United States Trustee to Motion for Entry of an Order (I) Approving the Implementation of the Debtors' Key Incentive Plan and Key Employee Retention Plan and (II) Granting Related Relief [Docket No. 188] (Date Filed: 3/13/19)
- c. Reservation of Rights of the Official Committee of Unsecured Creditors to Debtors' Motion for Entry of an Order (I) Approving the Implementation of the Debtors' Key Employee Incentive Plan and Key Employee Retention Plan and (II) Granting Related Relief [Docket No. 202] (Date Filed: 3/14/19)
- d. Debtors' Reply to Objection of the United States Trustee to Debtors' Motion for Entry of an Order (I) Approving the Implementation of the Debtors' Key Employee Incentive Plan and Key Employee Retention Plan and (II) Granting Related Relief [Docket No. 221] (Date Filed: 3/18/19)
- e. Order (I) Approving the Implementation of the Debtors' Key Employee Incentive Plan and Key Employee Retention Plan and (II) Granting Related Relief [Docket No. 333] (Date Filed: 4/24/19)

- f. Debtors' Supplement and Proposed Amendment to Debtors' Motion for Entry of an Order (I) Approving the Implementation of the Debtors' Key Employee Incentive Plan and Key Employee Retention Plan and (II) Granting Related Relief [Docket No. 334] (Date Filed: 4/24/19)

Objection

Deadline: N/A

Status: This matter is going forward.

Dated: April 29, 2019
New York, New York

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

/s/ James J. Mazza, Jr.

Paul D. Leake

Jason N. Kestecher

Four Times Square

New York, New York 10036-6522

Telephone: (212) 735-3000

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